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Counsel for Defendant
Jewish Voice Inc.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Daniel Fellner

Plaintiff,

v.

Jewish Voice, Inc.

Defendant.

Case No. 1:18-cv-05965-NGG-CLP

**OFFER OF JUDGMENT PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 68**

PLEASE TAKE NOTICE THAT, Defendant, Jewish Voice Inc., hereby offers to allow entry of judgment to be taken against it pursuant to Rule 68 of the Federal Rules of Civil Procedure as follows: a judgment in favor of Plaintiff and against Defendant in the sum of \$5,000 (Five Thousand dollars) less the amount of costs accrued in favor of Plaintiff, with the result that the total judgment amount, including recoverable costs, which Defendant shall be obligated to pay shall be \$5,000. This shall be the total amount to be paid by Defendant on

account of any and all liability claimed in this action, including costs, expenses, attorneys fees and pre-judgment interest otherwise recoverable in this action by Plaintiff.

If Plaintiff does not accept this offer, he will be obligated to pay Defendant's costs incurred after making this offer in the event he does not recover a judgment that is more favorable than this offer of judgment pursuant to Rule 68(d) of the Federal Rules of Civil Procedure.

To accept this offer, Plaintiff must serve written notice of acceptance thereof within fourteen (14) days of the date within which this offer is made.

This offer is not to be construed in any way as an admission of liability of Defendant, but rather is made solely for the purpose of compromising a disputed claim.

Dated: March 29, 2019

Respectfully submitted,

/s/ Stephen A. Soffen

Stephen A. Soffen
EDNY #SS4547
BLANK ROME LLP
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I filed this Offer of Judgment with the Clerk of the United States District Court for the Eastern District of New York and served a copy on counsel of record on March 29, 2019, by operation of the Court's CM/ECF system.

Dated: March 29, 2019

Respectfully submitted,

/s/ Stephen A. Soffen

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